

JOSEPH D. MARCHAND, ESQUIRE, TRUSTEE
117-119 West Broad Street
P.O. Box 298
Bridgeton, New Jersey 08302
(856) 451-7600
JM:5998

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY

IN THE MATTER OF:

Garet McLean,

Debtor(s)

} In Bankruptcy Proceeding:

} Chapter 7

} Case No. 19-31579/JNP

} **CERTIFICATION IN SUPPORT OF**
} **NOTICE OF MOTION TO**
} **DISMISS BANKRUPTCY PETITION**

} Returnable: **July 28, 2020 @ 11 A.M.**

} (Disposition on the papers)

JOSEPH D. MARCHAND, ESQUIRE, of full age, hereby certify and say:

1. I am an Attorney-at-Law licensed to practice in the State of New Jersey, and the party appointed by the United States Trustee's Office on November 26, 2019 as the duly qualified and acting Trustee for the debtor(s) bankruptcy estate captioned herein.

2. The debtor(s) filed their original petition under Chapter 7 of the Bankruptcy Code on November 15, 2019. The 341 Hearing was scheduled for January 31, 2020 and held on said date.

3. The Trustee requested additional information following the hearing (see attached emails dated February 5, 2020 & March 6, 2020 and nothing further was supplied)

Therefore, in light of the aforesaid, it is respectfully requested that petitioner's bankruptcy be dismissed for failure to cooperate with the Trustee.

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

DATED: July 1, 2020

/s/ Joseph D. Marchand

JOSEPH D. MARCHAND, ESQUIRE
CHAPTER 7 TRUSTEE

JOSEPH D. MARCHAND

ATTORNEY AT LAW

117-119 West Broad Street

P.O. Box 298

Bridgeton, New Jersey 08302

(856) 451-7600

Fax: (856) 451-6535

MEMBER OF NJ & PA BAR

February 5, 2020

Barry Beran, Esquire

RE: **Garet McLean**
Chapter 7 Bankruptcy, Case No. 19-31579/JNP
341 Hearing: 1/31/2020 @ 9:00 AM

Dear Counsel:

This will confirm my conversation with you at the Section 341 Hearing held in this matter on January 31, 2020 at which time it was agreed that you would supply this Trustee with the following information and/or make the following corrections:

1. **Provide a copy of the Deed on the property located at 1843 Phillip Street, Camden, NJ;**
2. **Prove a CMA on the property located at 1843 Phillip Street, Camden, NJ;**
3. **Provide copies of Bank Statements for the Wells Fargo account(NOT ENDING with 5534) for 8/15/19-11/15/19;**
4. **Provide a copy of Debtor's 2019 Federal & State Tax Return(once filed).**

Kindly supply the above information or complete the above corrections within **(2) weeks** from the date of this correspondence. If same is not completed within this time period a Motion to Dismiss your client's Bankruptcy Petition for failure to cooperate with the Trustee will be filed. Trusting this is not necessary, I remain

Very truly yours,


/s/ Joseph D. Marchand

JOSEPH D. MARCHAND, ESQUIRE
Chapter 7 Bankruptcy Trustee
JDM:mmh

Please be advised that it is my office policy to only receive information by regular mail only and will not accept information by e-mail or fax, unless otherwise stated.

JOSEPH D. MARCHAND

ATTORNEY AT LAW

117-119 West Broad Street

P.O. Box 298

Bridgeton, New Jersey 08302

(856) 451-7600

Fax: (856) 451-6535

MEMBER OF NJ & PA BAR

February 5, 2020

2nd Request March 6, 2020

Barry Beran, Esquire
Beran & Beran
102 Browning Lane, Bldg C Suite 1
Cherry Hill, NJ 08003

RE: **Garet McLean**
Chapter 7 Bankruptcy, Case No. 19-31579/JNP
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4. **Provide a copy of Debtor's 2019 Federal & State Tax Return(once filed).**

If I have not received the requested information by March 27, 2020, I will be forced to file a Motion to Dismiss the debtor's bankruptcy. If a Motion is filed, I will not withdraw the Motion even if the information is supplied as I now request a fee of \$300.00 to cover the costs of filing the Motion. Trusting this is not necessary, I remain

Very truly yours,

/s/ Joseph D. Marchand

JOSEPH D. MARCHAND, ESQUIRE
Chapter 7 Bankruptcy Trustee
JDM:mmh

cc: **Garet McLean**
1209 Chestnut Street
Paulsboro, NJ 08066

Please be advised that it is my office policy to only receive information by regular mail only and will not accept information by e-mail or fax, unless otherwise stated.